

## MEMORANDUM

Date: October 2, 1991

Paul E. Takacs, FSMU

Division File To:

Subject: L1630200005 -- St. Clair County

Sauget Sites (Area 1) -- Sauget

Superfund/Compliance

Speaking with a company representative, it was learned that Monsanto is intending to perform a removal action at a portion of Dead Creek Segment B (CS-B). This proposed removal action will be inclusive of Site M and sections of CS-B not owned by Cerro Copper, Wiese Engineering and Andrew Hankins.

In order to determine if the removal is feasible, Monsanto will perform a site investigation to characterize creek sediments. This characterization will determine the suitability of the creek sediment for disposal at an off-site landfill. In order to meet a current land-ban deadline of March 8, 1992 for these types of sediments, an engineering study will also be performed to determine what dewatering methods could prepare this material for removal by March 8. The proposed removal action closely parallels Cerro Copper's work at Dead Creek Segment A last year.

Monsanto intends to perform this site investigation during the week of October 14, 1991. If Monsanto and the State conclude that a removal is legally and technically feasible, Monsanto must enter into a Consent Decree if the action is to be approved of by the In the event that it is not, Monsanto intends to reserve its preference on remediation of CS-B only after the Area 1 RI/FS is performed. As was the case in Site R with the performance of any work prior to the Sauget Sites being listed, it was recommended that Monsanto follow current USEPA QAPP guidelines so that data collected during these studies can be admissible to the RI/FS.

After Monsanto performed a title search of the area, all property owners in CS-B were given request for access letters. Copper, Wiese Engineering and Andrew Hankins denied access to Monsanto on their properties in Dead Creek. These properties (within creek boundaries) consist of approximately the northernmost 480 feet of CS-B.

## Attachment

cc: Terry Ayers Jim Janssen Charles Northrup Jim Morgan, IAGO Mara McGinnis